

THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MELISSA WHITE,	)	
ROGER WHITE,	)	
	)	No. 23-cv-01761-JHC
Plaintiffs,	)	
vs.	)	STIPULATED MOTION TO STAY
	)	DISCOVERY PENDING THE
	)	OUTCOME OF DEFENDANTS'
KING COUNTY SHERIFFS OFFICE,	)	FRCP 12(c) MOTION TO DISMISS
TYLER HUNT in both his official and individual	)	AND ORDER TO STAY
capacity,	)	
JEFFREY PETRENTCHAK in both his official and	)	
individual capacity,	)	
ENRICO DONAGLIA in both his official and	)	
individual capacity,	)	
STEVEN MINTERS in both his official and	)	
individual capacity, and	)	
MITZI JOHANKNECHT in both her official and	)	
individual capacity	)	
	)	
Defendants.	)	
	)	

**I. STIPULATION**

For good cause shown and pursuant to Federal and Local Rule of Civil Procedure 16(b)(6), and this Court's broad discretion over discovery matters, Plaintiff Melissa White and Roger White, and Defendants King County Sheriff's Office, Tyler Hunt, Jeffrey

STIPULATED MOTION TO STAY DISCOVERY PENDING  
THE OUTCOME OF DEFENDANTS' FRCP 12(c) MOTION  
TO DISMISS AND ORDER TO STAY - 1  
No. 23-cv-01761-JHC

1 Petrenchak, Enrico Donaglia, Steven Minters, and Mitzi Johankencht, (collectively “the  
2 County Defendants”) respectfully and jointly move the Court for entry of an order  
3 staying all discovery deadlines in this matter until a decision has been  
4 issued on the Defendants’ FRCP 12(c) motion to dismiss. (Dkt. 42)

5 For good cause shown and with the Court’s consent, the Court may modify the  
6 deadlines in the scheduling order. Fed. R. Civ. P. 16(b)(4); *see also* LCR 16(b)(6). Further,  
7 this Court has “broad discretion to stay discovery pending the resolution of potentially  
8 dispositive motions.” *See Dorian v. Amazon Web Services, Inc.*, No. 2:22-cv-00269, 2022 WL  
9 3155369, \*1 (W.D. Wash Aug. 8, 2022); *see also Little v. City of Seattle*, 863 F.2d 681, 685 (9th  
10 Cir. 1988); *Taylor v. McDonough*, Case No. 20-5471 RJB, 2021 WL 9649333 (W.D. Wash.  
11 May 17, 2021).

12  
13 On August 15, 2024, the parties conferred regarding the status of discovery. The  
14 parties have cooperatively exchanged written discovery thus far, and the next step in  
15 discovery will involve depositions and then expert disclosures and reports. Depositions,  
16 and preparation thereof, involve significant time and expense for any party. Similarly,  
17 preparation of expert reports will also require the parties and their experts to expend  
18 significant time and resources. The parties have agreed to respond to outstanding  
19 discovery requests.  
20

21  
22 The parties also conferred about the efficiency of any further discovery, written or  
23 otherwise, while the motions to dismiss are pending. The parties agree that, rather than

1 seeking further extensions of the case deadlines, and potentially expending time and  
2 resources on multiple stipulations to continue, a more efficient course of action would be  
3 to file a stipulated motion to stay discovery pending the outcome of the Defendants'  
4 motion to dismiss. Once a decision has been issued, if necessary, the parties will confer  
5 and prepare a new case schedule for the Court's consideration, beginning with the  
6 Deadline for Amended Pleadings, as Plaintiff wishes to preserve her ability to amend the  
7 pleadings should the need arise.

8  
9 The parties now jointly move the Court for an order to that effect.

10 THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

- 11 1. All discovery deadlines in this case shall be stayed until the Court issues a decision  
12 on the pending motion to dismiss filed by the County Defendants (Dkt. 42).  
13 2. After the Court has issued a decision on the aforementioned motion to dismiss, if  
14 applicable, the parties shall confer and submit to the Court a stipulated order  
15 lifting the stay and proposing a new case schedule under which discovery will be  
16 completed, beginning with the Deadline for Amended Pleadings.

17 *I hereby certify that this memorandum contains 469 words in compliance with Local Civil*  
18 *Rules.*

19 IT IS SO STIPULATED.

20 DATED this 26<sup>th</sup> day of August 2024.

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22 //

23  
24 STIPULATED MOTION TO STAY DISCOVERY PENDING  
THE OUTCOME OF DEFENDANTS' FRCP 12(c) MOTION  
TO DISMISS AND ORDER TO STAY - 3  
No. 23-cv-01761-JHC

1 LEESA MANION (she/her)  
2 King County Prosecuting Attorney

3 By: /s/ Karissa L Taylor  
4 KARISSA L. TAYLOR, WSBA #31563  
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By: /s/ Melissa White (as per email authorization)  
Melissa White, Pro Se Plaintiff  
Melissa White  
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8 **ORDER**

9 THIS MATTER having come on regularly for hearing upon the stipulation of the  
10 parties above contained, and the Court being fully advised on the premises, now,  
11 therefore, it is hereby ORDERED that:

- 12 1. All discovery deadlines in this case shall be stayed until the Court issues a  
13 decision on the pending motion to dismiss filed by the County Defendants (Dkt.  
14 42).
- 15 2. After the Court has issued a decision on the aforementioned motions to dismiss,  
16 if applicable, the parties shall confer and submit to the Court a stipulated order  
17 lifting the stay and proposing a new case schedule under which discovery will be  
18 completed, starting with the Plaintiff's deadline to amend pleadings.  
19

20 DATED this 27th day of August, 2024.

21   
22 John H. Chun  
23 United States District Judge

24 STIPULATED MOTION TO STAY DISCOVERY PENDING  
THE OUTCOME OF DEFENDANTS' FRCP 12(c) MOTION  
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